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ILLINOIS COMMERCE COMMISSION

STATE OF ILLINOIS

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ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission  
On Its Own Motion

Docket No. 03-0767

Investigation into the proper allocation of  
line extension and service of installation costs

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**RESPONSE OF LOCAL UNIONS 15, 51, AND 702 OF THE  
INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, AFL-CIO TO  
THE HOME BUILDERS ASSOCIATION OF ILLINOIS' MOTION TO EXTEND TIME**

NOW COMES Local Unions 15, 51, and 702 of the International Brotherhood of Electrical Workers, AFL-CIO (the "IBEW"), by and through its attorney, and files the IBEW's response to the Home Builders Association of Illinois' (the "Home Builders") Motion To Extend The Time To File Its Brief In Reply To Exceptions. For the reasons stated below, the IBEW has no objection to the Home Builders' motion.

1. On November 8, 2005, the Administrative Law Judge issued a Proposed Order in this proceeding that required the parties to file Briefs On Exceptions on or before November 15, 2005. Proposed Order at 3. The Proposed Order, however, made no provision nor schedule for the parties to file Briefs In Reply To Exceptions.

2. Pursuant to the Administrative Law Judge's Proposed Order, the IBEW and the Staff of the Illinois Commerce Commission separately filed their Briefs On Exceptions on November 15, 2005.

3. On November 18, 2005, the Home Builders filed its Motion To Extend The Time To File Its Brief In Reply To Exceptions (the "Motion") pursuant to Section 200.830(a) of the Commission's Rules of Practice. Section 200.830(a), according to the Home Builders, provides

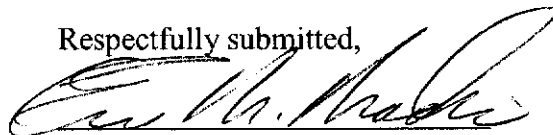
a default rule that allows a party to file a Brief in Reply to Exceptions within seven days after the time of filing Briefs on Exceptions. Home Builders' Motion at 1.

4. In its Motion, the Home Builders claim that the IBEW "made new arguments about subjects not previously raised in their docket," and that they need additional time to analyze and respond to this "new material." Home Builders Motion at 2. The Home Builders request that the Administrative Law Judge grant them until November 30, 2005 or fifteen days to file its Brief In Reply To Exceptions. Id.

5. The IBEW has no objection to the Home Builders' Motion provided that the Administrative Law Judge accords the IBEW an equivalent fifteen-day time period to file a responsive pleading or motion to the Home Builders' Brief In Reply To Exceptions.

WHEREFORE, the IBEW respectfully requests that the Administrative Law Judge grant the Home Builders' Motion to file its Brief In Reply To Exceptions on or before November 30, 2005, so long as the IBEW may file a responsive pleading or motion to the Home Builders' Brief In Reply To Exceptions on or before December 15, 2005.

Respectfully submitted,



Eric M. Madiar  
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November 21, 2005

Counsel for Locals 15, 51 and 702 of the  
International Brotherhood of Electrical  
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STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission  
On Its Own Motion

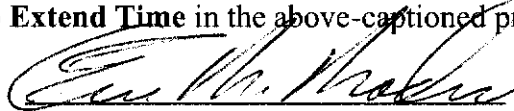
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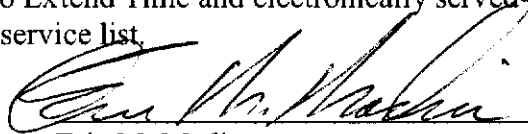
Please take notice that on **November 21, 2005**, I caused to be filed with the Chief Clerk of the Illinois Commerce Commission, Elizabeth Rolando, 527 East Capitol Avenue, Springfield, IL 62701 the enclosed **Response of Local Unions 15, 51, and 702 of the International Brotherhood of Electrical Workers, AFL-CIO to the Home Builders Association of Illinois' Motion To Extend Time** in the above-captioned proceeding.



Eric M. Madiar  
Attorney for Local Unions 15, 51, and 702  
International Brotherhood of Electrical Workers, AFL-CIO

**CERTIFICATE OF SERVICE**

Please take note that on November 21, 2005, I, Eric M. Madiar, hereby certify that I did file with the Illinois Commerce Commission the foregoing Response of Local Unions 15, 51, and 702 of the International Brotherhood of Electrical Workers, AFL-CIO to the Home Builders Association of Illinois' Motion To Extend Time and electronically served the same upon the person identified on the attached service list.



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